

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DR. MORGAN REYNOLDS on behalf
of the UNITED STATES OF AMERICA

Plaintiff,

vs.

SCIENCE APPLICATIONS
INTERNATIONAL CORP.; APPLIED
RESEARCH ASSOCIATES, INC.;
NuSTATS; COMPUTER AIDED
ENGINEERING ASSOCIATES,
INC.; DATASOURCE, INC.;
GEOSTAATS, INC.; GILSANZ
MURRAY STEFICEK LLP; HUGHES
ASSOCIATES, INC.; AJMAL ABBASI;
EDUARDO KAUSEL; DAVID PARKS;
DAVID SHARP; DANIELE VENEZANO;
JOSEF VAN DYCK; KASPAR WILLIAM;
ROLF JENSEN & ASSOCIATES, INC.;
ROSENWASSER/GROSSMAN
CONSULTING ENGINEERS, P.C.;
SIMPSON GUMPERTZ & HEGER, INC.;
S. K. GHOSH ASSOCIATES, INC.;
SKIDMORE, OWINGS & MERRILL,
LLP; TENG & ASSOCIATES, INC.;
UNDERWRITERS LABORATORIES,
INC.; and WISS, JANNEY, ELSTNER
ASSOCIATES, INC.

Defendants.

Case No. 07CV4612 (GBD)

**AFFIDAVIT OF GAIL D. ZIRKELBACH
IN SUPPORT OF APPLIED RESEARCH
ASSOCIATES, INC.'S MOTION FOR
SANCTIONS PURSUANT TO FED. R. CIV. P.
11 AND § 3730(d)(4) OF THE FCA**

Gail D. Zirkelbach, being duly sworn, hereby deposes and says as follows:

1. I am a member of Jackson Kelly PLLC, attorneys of record for Defendant Applied Research Associates, Inc. in the captioned case.
2. I am admitted *pro hac vice* in this matter.
3. I submit this Affidavit in Support of Applied Research Associates, Inc.'s Motion for Sanctions Pursuant to Fed. R. Civ. P. 11 and § 3730(d)(4) of the FCA, solely to submit certain documents for consideration by the Court, all of which are public records or otherwise publicly available.

